# 510(k) SUBSTANTIAL EQUIVALENCE DETERMINATION INSTRUMENT AND ASSAY TEMPLATE

### **A.** 510(k) Number:

k111188

### **B.** Purpose for Submission:

New Device

#### C. Measurand:

pH, pO2, pCO2, sodium, potassium, ionized calcium, Hct, tHb, O2Hb, HHb, COHb, MetHb, SO2, lactic acid, glucose

### **D.** Type of Test:

Quantitative

## E. Applicant:

**Roche Diagnostics Corporation** 

### F. Proprietary and Established Names:

**Cobas® b** 123 POC System, **Cobas® b** 123 AutoQC Pack Tri-Level, **Cobas® b** 123 AutoCVC Pack, Roche COMBITROL PLUS B

### **G.** Regulatory Information:

Product	Classification	Regulation Section	Panel
Code			
CHL	Class II	21 CFR § 862.1120	75
		Blood gases (pCO2, pO2) and blood pH test	
		system	
JGS	Class II	21 CFR § 862.1665	75
		Sodium test system	
CEM	Class II	21 CFR § 862.1600	75
		Potassium test system	
JFP	Class II	21 CFR § 862.1145	75

		Calcium test system	
GKF	ass II	21 CFR § 864.5600	81
		Hematocrit automated instrument	
CGA	Class II	21 CFR § 862.1345	75
		Glucose test system	
KHP	Class I, meets	21 CFR § 862.1450	75
	limitations of		
	exemptions	Lactic acid test system	
	per 21 CFR §		
	862.9 (c)(9)		
KHG	Class II	21 CFR § 864.7500	81
		Whole blood hemoglobin assays (tHb)	
GGZ	Class II	21 CFR § 864.7500	81
		Whole blood hemoglobin assays	
		(Oxyhemoglobin)	
GKA	Class II	21 CFR § 864.7500	81
		Deoxyhemoglobin	
GHS	Class II	21 CFR § 864.7425	81
		Carboxyhemoglobin	
KHG	Class II	21 CFR § 864.5620	81
		Methemoglobin	
GLY	Class II	870.1230 Oximeter	81
		Oxygen Saturation	
JJY	Class I,	21 CFR § 862.1660	75
	reserved		
		Quality control material (assayed and	
		unassayed)	

# H. Intended Use:

# 1. <u>Intended use(s):</u>

See indications for use statements below.

# 2. <u>Indication(s) for use:</u>

### **Device Name: cobas® b 123 POC System**

The **cobas b** 123 POC system is a fully automated POC system for whole blood in vitro measurement of pH, blood gases (BG), electrolytes Na<sup>+</sup>, K<sup>+</sup>, iCa<sup>2+</sup> (ISE), hematocrit (Hct), metabolites (Glu, Lac), total hemoglobin (tHb), hemoglobin derivatives (O<sub>2</sub>Hb, HHb, COHb, MetHb), and oxygen saturation (SO<sub>2</sub>). In addition, the **cobas b** 123 POC system calculates derived parameters.

It is dedicated for use in a Point-of-Care environment and laboratory. The integrated AutoQC module and the oximeter module are available as an option.

pH,  $pO_2$  and  $pCO_2$ : pH,  $pO_2$  and  $pCO_2$  measurements are used in the diagnosis and treatment of life-threatening acid-base disturbances.

Sodium (Na<sup>+</sup>): sodium measurements are used in the diagnosis and treatment of aldosteronism, diabetes insipidus, adrenal hypertension, Addison's disease, dehydration, inappropriate antidiuretic secretion, or other diseases involving electrolyte imbalance.

Potassium (K<sup>+</sup>): potassium measurements are used to monitor electrolyte balance in the diagnosis and treatment of disease conditions characterized by low or high blood potassium levels.

Calcium (Ca<sup>2+</sup>): calcium measurements are used in the diagnosis and treatment of parathyroid disease, a variety of bone diseases, chronic renal disease and tetany (intermittent muscular contractions or spasms).

Hematocrit (Hct): hematocrit measurements are used to distinguish normal from abnormal states of whole blood, such as anemia and erythrocytosis (an increase in the number of red cells).

Glucose (Glu): glucose measurements are used in the diagnosis and treatment of carbohydrate metabolism disorders including diabetes mellitus and idiopathic hypoglycemia, and of pancreatic islet cell carcinoma.

Lactate (Lac): Lactate measurements are used to evaluate the acid-base status and are used in the diagnosis and treatment of lactic acidosis (abnormally high acidity of the blood.)

Total Hemoglobin (tHb): total hemoglobin measurements are used to measure the hemoglobin content of whole blood for the detection of anemia.

O<sub>2</sub>Hb: oxyhemoglobin as a fraction of total hemoglobin.

COHb: carboxyhemoglobin measurements are used to determine the carboxyhemoglobin content of human blood as an aid in the diagnosis of carbon monoxide poisoning.

MetHb: methemoglobin as a fraction of total hemoglobin.

HHb: reduced hemoglobin as a fraction of total hemoglobin.

SO<sub>2</sub>: oxygen saturation, more specifically the ratio between the concentration of oxyhemoglobin and oxyhemoglobin plus reduced hemoglobin.

# Device Name: cobas® b 123 AutoQC Pack Tri-Level

The **cobas b** 123 AutoQC pack Tri-Level is a multi-analyte control intended for use as control material to monitor the measurement of pH, PCO<sub>2</sub>, PO<sub>2</sub>, SO<sub>2</sub>, Na<sup>+</sup>, K<sup>+</sup>, iCa<sup>2+</sup>, Hct, tHb and Hb derivatives as well as glucose and lactate on **cobas b** 123 systems with an AutoQC module.

# Device Name: cobas® b 123 AutoCVC Pack

The **cobas b** 123 AutoCVC Pack is a multi-analyte control, intended for use in calibration verification of the measuring range established by the **cobas b** 123 POC system for pH, PCO<sub>2</sub>, PO<sub>2</sub>, SO<sub>2</sub>, Na<sup>+</sup>, K<sup>+</sup>, iCa<sup>2+</sup>, Hct, tHb and Hb derivatives as well as glucose and lactate on **cobas b** 123 systems with an AutoQC module.

#### **Device Name: Roche COMBITROL PLUS B**

COMBITROL PLUS B is a multi-analyte control intended for use as control material to monitor the measurement of pH, PCO<sub>2</sub>, PO<sub>2</sub>, SO<sub>2</sub>, Na<sup>+</sup>, K<sup>+</sup>, iCa<sup>2+</sup>, Hct, tHb and Hb derivatives as well as glucose, lactate, urea/BUN and bilirubin on Roche OMNI S or **cobas b** 221 analyzers with an oximeter module, and **cobas b** 123 analyzers (except urea/BUN, and bilirubin). COMBITROL PLUS B control material is not intended for use with analyzers from other manufacturers.

#### 3. Special conditions for use statement(s):

For prescription use.

For Point of Care

#### 4. Special instrument requirements:

Cobas b 123 POC System

#### I. Device Description:

The **cobas b** 123 POC system consists of a modular system analyzer which contains the following components:

An electrochemical sensor system independent of the reagent delivery system for the following analytes:

- pCO2, pH, calcium, potassium, and sodium (potentiometric measurement)
- pO2 (amperometric measurement)
- Hct (conductivity measurement)
- Glucose and Lactate enzyme (amperometric measurement)

An optionally integrated oximeter module consisting of a spectrometer, measurement and calibration light source, respectively, an ultrasonic hemolyzer and thermostatic components measure SO2, tHb, O2Hb, HHb, COHb, and MetHb

A disposable, self-contained sample and reagent delivery system containing liquid reagents, calibrators and waste container, built-in safety shielded sample port, built-in oximeter cuvette, two peristaltic pump fluidics systems, and built in air filter

The system also includes an optional integrated Auto QC module that uses a disposable cassette containing three levels of QC material.

A smart memory chip is incorporated into each biosensor, reagent pack (sample and reagent delivery system) and AutoQC cassette which tracks and monitors the sensor,reagent pack, AutoQC and AutoCVC cassette usage

### Cobas b 123 AutoQC Pack Tri-Level:

• 24 single glass ampoules of multi-analyte controls in 3 levels

#### Cobas b 123 AutoCVC Pack:

• 24 single glass ampoules of multi-analyte controls in 6 levels

#### Roche COMBITROL PLUS B:

• Multi-analyte controls available in 3 levels

#### J. Substantial Equivalence Information:

The **cobas b** 123 POC System is equivalent to **cobas b** 221 (OMNI S Analyzer) k032311 for the following parameters:

- pH
- pO2
- pCO2
- Na+
- K+

- Ca2+
- Hct
- tHb
- O2Hb
- HHb
- COHb
- MetHb
- SO2

The **cobas b** 123 POC system is equivalent to Roche Gluco-Quant Glucose/HK assay on the Hitachi 902 (k921661) and the Roche Glucose HK Assay on the **cobas c 501 analyzer** (k060373/A001) for the measurement of glucose.

The **cobas b** 123 POC system is equivalent to the Roche Lactate assay on the Hitachi 902 analyzer (k921661) and the Lactate Generation 2 (Gen.2) assay on the **cobas c** 501 analyzer (k060373) for the measurement of lactate.

The **cobas b** 123 AutoQC Pack Tri-Level, **cobas b** 123 AutoCVC Pack, and COMBITROL PLUS B materials are substantially equivalent to the Roche AUTOTROL PLUS B and Roche COMBITROL PLUS B materials – k032453.

Similarities between candidate and predicate devices:

Characteristic	Candidate Device: cobas b 123 POC System	Predicate Device: cobas b 221 (k032311)
Intended Use	The <b>cobas b</b> 123 POC system is a fully automated POC system to measure pH, blood gases (BG), electrolytes (ISE), hematocrit (Hct), metabolites (Glu, Lac), total hemoglobin (tHb), hemoglobin derivatives (O2Hb, HHb, COHb, MetHb), and oxygen saturation (SO <sub>2</sub> ). In addition, the <b>cobas b</b> 123 POC system calculates derived parameters. It is dedicated for use in a Point-of-Care environment and laboratory. The integrated AutoQC module and the oximeter module are available as an option. Depending on the equipment configuration of the instrument, the Sensor Cartridge and the Fluid Pack used, the following parameters are measured in human whole blood and QC materials.	Same

Test Principle	Enzymatic (Lactate)	Same
	Enzymatic (Glucose)	
Blood Gas	pH and pCO <sub>2</sub> by potentiometry	Same
Measurement		
	pO <sub>2</sub> by amperometry	
T1 1	W V 10 1	
Electrolyte	K <sub>+</sub> , Na <sub>+</sub> , and Ca <sub>2+</sub> by potentiometry	Same
Measurement		
Metabolite	Glucose and Lactate by amperometry	Same
Measurement		
Hamaglahin	the soa oane mile come	Sama
Hemoglobin Measurement	tHb, SO2, O2Hb, HHb, COHb,	Same
Hematocrit	MetHb:Spectrophotometric Conductivity	Same
Measurement	Conductivity	Same
	A mnonometric and notantiametric thick	Same
Sensor Technology	Amperometric and potentiometric thick	Same
	film microelectrode array technology for Glucose and Lactate	
Commis Introduction		Come
Sample Introduction	Syringe and capillary aspiration	Same
On-Board (In-Use)	Up to 42 days	Same
Reagent Stability	Manager alice to the state of the	C
Reagent Tracking	Memory chip technology for	Same
	identification, lot specifications, usage	
	tracking and traceability allowing pack	
	to be moved from one system to	
OCM : 1	another COMPUTED OF DEFINE TO SERVICE TO SER	G
QC Material	COMBITROL PLUS B (manual QC)	Same
	and AUTOTROL PLUS B (automated	
Calibration	QC) Two-point liquid calibration	Same
Graphical User	Menu-driven touch screen	
Interface	Menu-anven touch screen	Same
	Hard drive and printer	Sama
Additional Analyzer Hardware	Hard drive and printer	Same
	Linux-based	Somo
Operating System Software	Linux-based	Same
	15-32°C	Sama
System Operating	13-32 C	Same
Temperature		

Characteristic	Candidate Device cobas b 123 AutoQC Pack Tri- Level	Predicate Device Roche AUTOTROL PLUS B (k032453)
Intended use	Intended for use as a quality control material	same
Number of Levels	3	Same
Matrix	Buffered, aqueous	Same
Wattix	electrolyte solution	Same
	equilibrated with carbon	
	dioxide and oxygen gas	
	mixture	
Technological	The material consists of	Same
Characteristics	buffered aqueous electrolyte	
	solutions with clinically	
	relevant concentrations of	
	the targeted analytes,	
	tonometered with precision	
	gas mixtures of carbon	
	dioxide and oxygen to	
	achieve pH and blood gas	
	values that span the range	
	of values typical for such	
	products with the same	
	intended use. A mixture of	
	dyes is used to simulate	
	absorbance of hemoglobin	
	derivatives. Hematocrit is	
	simulated by conductivity.	

Characteristic	Candidate Device Modified COMBITROL PLUS B	Predicate Device Roche AUTOTROL PLUS B (k032453)
Intended Use	intended for use as a quality control material	same
Number of Levels	3	Same
Fill Volume	1.7 mL	Same
Matrix	Buffered, aqueous electrolyte solution equilibrated with carbon dioxide and oxygen gas mixture	Same
Technological Characteristics	The material consists of buffered aqueous electrolyte solutions with clinically relevant concentrations of	Same

the targeted analytes,	
tonometered with precision	
gas mixtures of carbon	
dioxide and oxygen to	
achieve pH and blood gas	
values that span the range	
of values typical for such	
products with the same	
intended use. A mixture of	
dyes is used to simulate	
absorbance of hemoglobin	
derivatives. Hematocrit is	
simulated by conductivity.	

Characteristic	Candidate Device cobas b 123 AutoCVC Pack	Predicate Device Roche AUTOTROL PLUS B (k032453)
Intended use	Intended for use as a quality control material	same
Matrix	Buffered, aqueous electrolyte solution equilibrated with carbon dioxide and oxygen gas mixture	Same
Technological Characteristics	The material consists of buffered aqueous electrolyte solutions with clinically relevant concentrations of the targeted analytes, tonometered with precision gas mixtures of carbon dioxide and oxygen to achieve pH and blood gas values that span the range of values typical for such products with the same intended use. A mixture of dyes is used to simulate absorbance of hemoglobin derivatives. Hematocrit is simulated by conductivity.	Same

<u>Differences</u> between candidate and predicate devices:

Characteristic	Candidate Device cobas b	Predicate Device cobas b
	123 POC System	221 (k032311)
Sample Volume	123 μ1	210 μl
Electrochemical Sensors	pH, PO <sub>2</sub> , PCO <sub>2</sub> , K <sub>+</sub> , Na <sub>+</sub> ,	pH, PO <sub>2</sub> , PCO <sub>2</sub> , K <sub>+</sub> , Na <sub>+</sub> , Cl,
	Ca2+, Glucose, Reference	Ca <sub>2+</sub> Reference electrodes
	microelectrode array	with 6 to 16 months in-use
	sensor with up to 28 days	life, depending on the
	in-use life	electrode type.
	<b>Note:</b> Sensors with Lactate	
	are stable up to 21 days.	
Electrochemical sensor	Sensor: $2^{\circ}C - 8^{\circ}C$ for 4	Sensor: 25°C for 18 or 24
storage stability	months	months, depending on
		electrode type
Auto QC Module	AutoQC Module holds one	QC module holds 120
	AutoQC Pack, which is	AUTOTROL PLUS B tri-
	comprised of 24	level ampoules.
	AUTOTROL PLUS B tri-	
	level ampoules.	

Characteristic	Candidate Device cobas b 123 POC System	Predicate Device Roche Hitachi Glucose HK Assays: Hitachi 902 (k921661) and cobas c 501 (k060373)
Sample Type	Whole Blood	Serum, plasma, urine, CSF, and hemolysate
Measurement Principle	Amperometric measurement of the detectable product (H <sub>2</sub> O <sub>2</sub> ) under a polarization voltage of 350 mV.	UV photometric measurement of the detectable product (NADPH) at 340 nm.

Characteristic	Candidate Device cobas b 123 POC System	Predicate Device Roche Hitachi Lactate Assays: Hitachi 902 (k921661) and cobas c 501 (k060373)
Measurement Principle	Amperometric measurement of the detectable product (H <sub>2</sub> O <sub>2</sub> ) under a polarization voltage of 350 mV.	UV photometric measurement of the detectable product (chromogen) at 340 nm.

Characteristic	Candidate Device cobas b 123 AutoQC Pack Tri-	Predicate Device Roche AUTOTROL PLUS B
	Level	(k032453)
Auto QC Pack	The AutoQC Pack is comprised of 24 AUTOTROL PLUS B trilevel ampoules. The AutoQC Pack also contains a smart memory chip for tracking and traceability, allowing the pack to be moved from one system to another.	The QC Pack holds 120 AUTOTROL PLUS B tri-level ampoules. The QC Pack does not contain a smart memory chip.
Fill Volume	1.0 mL	1.7 mL

#### K. Standard/Guidance Document Referenced (if applicable):

- 1. EP5-A2: Evaluation of Precision Performance of Quantitative Measurement Methods; Approved Guideline
- 2. EP6-A: Evaluation of the Linearity of Quantitative Measurement Procedures: A Statistical Approach; Approved Guideline
- 3. EP7-A2: Interference Testing in Clinical Testing; Approved Guideline Second Edition
- 4. EP9-A2: Method Comparison and Bias Estimation Using Patient Samples; Approved Guideline Second Edition
- 5. EP17-A: Protocols for Determination of Limits of Detection and Limits of Quantitation; Approved Guideline
- 6. IEC 61326-1: Electrical Equipment for Measurement, Control and Lab Use-EMC Requirements (Part 1: General Requirements)
- 7. IEC 61326-2: Electrical Equipment for Measurement, Control and Lab Use- EMC Requirements (Part 2-6: IVD Equipment)

#### L. Test Principle:

The cobas b 123 POC system measures the analytes pH, K+, Ca2+, and Na+ use potentiometric sensors which transmit direct signals that relate the content of the sample to be measured. A reference electrode is used to provide a stable, fixed

potential against which other potential differences can be measured.

Amperometry is used to measure glucose, lactate, and pO2. For this method of measurement, the magnitude of an electrical flow of current proportional to the concentration of the substance being oxidized or reduced at an electrode results in a measurement of glucose, lactate, and pO2 in the blood.

Spectrophotometry is used to measure the analytes: tHb, SO2, O2Hb, HHb, COHb, MetHb. For this method, light passes through the blood samples; specific wavelengths are absorbed and their intensity generates an absorption spectrum used to calculate oximetry parameters.

#### M. Performance Characteristics (if/when applicable):

All performance studies were conducted on the **cobas b** 123 POC system.

#### 1. Analytical performance:

#### a. Precision/Reproducibility:

A precision study was performed following CLSI EP5-A2 guidance. Within – run and total precision were conducted using control materials and/or tonometered whole blood samples in duplicate in two runs per day for 20 days (N=80). Testing was conducted using the cobas b 123 POC syringe mode. Results of the precision studies are as follows:

	pH Precision Data								
Sample	Mean (pH Units)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	7.149	80	0.007	0.04	0.020	0.08			
Level 2	7.393	80	0.007	0.02	0.020	0.06			
Level 3	7.543	80	0.007	0.02	0.020	0.06			
Level 4	6.883	80	0.012	0.02	0.028	0.12			
Level 5	7.731	80	0.014	0.02	0.033	0.08			

	pO2 Precision Data								
Sample	Mean (mmHg)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Blood 1	145.4	80	1.629	0.51	3.039	2.23			
Blood 2	40.5	80	1.974	1.70	3.306	6.09			
Blood 3	352.2	80	6.614	0.59	12.553	2.49			
Level 1	58.5	80	4.550	1.79	5.076	3.00			

Level 2	98.7	80	4.775	1.69	5.358	3.57
Level 3	147.6	80	5.442	0.78	6.188	3.17
Level 4	28.9	80	6.595	6.32	7.643	8.31
Level 5	448.5	80	23.168	1.25	29.963	3.76

	pCO2 Precision Data								
Sample	Mean	N	Within	Within	Total	Total			
	(mmHg)		run SD	run %	imprecision	Imprecision			
				CV	SD	%CV			
Blood 1	23.5	80	1.150	0.50	1.725	2.21			
Blood 2	72.7	80	1.570	0.51	2.180	3.18			
Blood 3	128.6	80	5.047	1.39	6.868	2.61			
Level 1	64.2	80	1.349	0.69	1.856	1.64			
Level 2	41.9	80	1.151	0.64	1.656	1.44			
Level 3	25.7	80	1.007	0.36	1.510	1.69			
Level 4	123.5	80	4.729	0.60	6.412	2.70			
Level 5	19.2	80	1.578	0.75	2.368	2.12			

	Na Precision Data								
Sample	Mean (mmHg)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	117.4	80	1.337	0.34	1.957	0.44			
Level 2	141.0	80	1.536	0.11	2.304	0.35			
Level 3	153.7	80	1.740	0.29	2.610	0.52			
Level 4	113.2	80	1.557	0.16	2.208	0.65			
Level 5	177.5	80	2.336	0.11	3.373	0.69			

	K Precision Data								
Sample	Mean (mmHg)	N	Within run SD	Within run %	Total imprecision	Total Imprecision			
	(IIIIIIII)		run SD	CV	SD	%CV			
Level 1	2.98	80	0.051	0.37	0.102	0.57			
Level 2	4.72	80	0.066	0.15	0.134	0.37			
Level 3	7.01	80	0.088	0.32	0.177	0.74			
Level 4	9.25	80	0.153	0.16	0.352	1.26			
Level 5	2.02	80	0.088	0.30	0.198	1.44			

	iCa Precision Data								
Sample	Mean (mg/dL)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	6.80	80	0.040	0.61	0.067	0.77			
Level 2	4.80	80	0.030	0.24	0.050	0.37			
Level 3	2.64	80	0.030	0.74	0.050	0.92			
Level 4	8.63	80	0.062	0.25	0.103	0.78			
Level 5	1.60	80	0.030	0.63	0.050	1.89			

	Hct Precision Data								
Sample	<b>Mean</b> (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	58.9	80	0.978	0.24	1.467	0.80			
Level 2	40.9	80	0.617	0.21	0.926	1.05			
Level 3	32.5	80	0.451	0.22	0.676	1.06			
Level 5	19.0	80	1.783	0.38	2.676	1.18			
Level 6	63.6	80	1.718	0.09	2.576	0.75			

	Glucose Precision Data								
Sample	Mean (mg/dL)	N	Within run SD	Within run %	Total imprecision	Total Imprecision			
	(IIIg/ull)			CV	SD	%CV			
Level 1	111	80	0.126	0.59	0.304	1.67			
Level 2	47.3	80	0.104	0.85	0.177	2.23			
Level 3	454.5	80	0.302	0.37	1.253	2.29			
Level 5	45.5	80	0.103	0.91	0.176	3.55			
Level 6	510	80	0.329	0.77	1.307	2.77			

	Lactate Precision Data								
Sample	Mean (mg/dL)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	96	80	0.36	0.37	2.24	2.34			
Level 2	29	80	0.07	0.24	0.58	2.03			
Level 3	15	80	0.05	0.32	0.42	2.65			
Level 5	57	80	0.59	1.04	1.34	2.37			
Level 6	128	80	0.92	0.72	3.83	3.00			

	tHb Precision Data								
Sample	Mean (g/dL)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	7.1	80	0.135	0.66	0.174	2.29			
Level 2	11.5	80	0.172	0.72	0.222	1.12			
Level 3	19.6	80	0.294	0.82	0.344	1.21			
Level 5	6.1	80	0.131	0.60	0.166	2.12			
Level 6	21.7	80	0.335	0.63	0.402	1.06			

	O2Hb Precision Data								
Sample	<b>Mean</b> (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	48.3	80	1.000	0.25	1.500	0.54			
Level 2	75.8	80	1.000	0.55	1.500	0.63			
Level 3	92.0	80	1.000	0.40	1.500	0.42			
Level 5	42.1	80	1.000	0.28	1.500	0.49			
Level 6	94.3	80	1.000	0.40	1.500	0.39			

	HHb Precision Data								
Sample	Mean (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	17.6	80	1.000	0.24	1.500	0.52			
Level 2	8.2	80	1.000	1.78	1.500	2.02			
Level 3	2.7	80	1.000	4.73	1.500	4.92			
Level 5	19.7	80	1.000	0.21	1.500	0.37			
Level 6	1.9	80	1.000	6.88	1.500	6.58			

COHb Precision Data								
Sample	Mean (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV		
Level 1	22.4	80	0.350	0.24	0.510	0.52		
Level 2	10.4	80	0.250	1.78	0.500	2.03		
Level 3	3.5	80	0.250	4.63	0.500	4.82		
Level 5	25.1	80	0.350	0.21	0.520	0.37		
Level 6	2.5	80	0.250	6.65	0.500	6.36		

	MetHb Precision Data								
Sample	Mean (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	11.7	80	0.286	0.21	0.545	0.46			
Level 2	5.7	80	0.250	1.49	0.500	1.70			
Level 3	2.0	80	0.250	3.98	0.500	4.13			
Level 5	13.1	80	0.314	0.18	0.583	0.33			
Level 6	1.4	80	0.250	5.67	0.500	5.41			

	SO2 Precision Data								
Sample	Mean (%)	N	Within run SD	Within run % CV	Total imprecision SD	Total Imprecision %CV			
Level 1	73.4	80	1.500	0.13	2.000	0.28			
Level 2	90.3	80	1.500	0.23	2.000	0.26			
Level 3	97.1	80	1.500	0.15	2.000	0.15			
Level 5	68.2	80	1.500	0.16	2.000	0.27			
Level 6	98.0	80	1.500	0.15	2.000	0.14			

An additional precision study was performed between the syringe mode and the capillary mode using whole blood samples. The syringe mode results provided by the sponsor demonstrated comparable results to the capillary mode. Within-run precision for all analytes (parameters) for the capillary mode are summarized below:

Analyta	Analyte Unit of		Capillary			
Analyte	Measure	Sample	Mean	$S_{\mathbf{R}}$	CV (%)	n
"II	nII Unito	1	7.18	0.003	0.04	24
pН	pH Units	2	7.36	0.002	0.02	32
<b>"</b> O	mmIIa	1	75.42	0.31	0.40	24
$pO_2$	mmHg	2	132.75	1.349	1.00	32
"CO	mmIIa	1	68.13	0.192	0.28	24
$pCO_2$	pCO <sub>2</sub> mmHg	2	31.43	0.199	0.63	32
		1	98.77	0.485	0.5	12
		2	113.51	0.187	0.2	12
Na <sup>+</sup>	mEq/L	3	141.34	0.676	0.5	12
		4	160.68	0.498	0.3	12
		5	183.69	0.431	0.2	12
		1	2.08	0.020	1.0	12
		2	4.88	0.048	1.0	12
$\mathbf{K}^{+}$	mEq/L	3	3.93	0.019	0.5	12
		4	12.48	0.041	0.3	12
		5	19.40	0.042	0.2	12

		1	2.20	0.020	0.9	12
iCa <sup>2+</sup>	ma/dI	2	4.88	0.036	0.8	12
iCa	mg/dL	3	11.69	0.108	0.9	12
		4	7.13	0.024	0.3	12
		1	64.81	0.123	0.20	8
		2	49.97	0.305	0.61	8
Hct	%	3	42.10	0.080	0.20	8
		4	28.70	0.062	0.20	8
		5	20.39	0.134	0.70	8
		1	101.44	0.025	0.5	8
	mg/dL	2	71.71	0.031	0.8	8
Glucose		3	81.08	0.032	0.7	8
		4	49.55	0.008	0.3	8
		5	274.05	0.071	0.5	8
		1	24.68	0.033	1.2	12
		2	34.77	0.034	0.9	12
Lactate	mg/dL	3	28.92	0.052	1.6	12
		4	59.82	0.028	0.4	12
		5	53.96	0.047	0.8	12
		1	15.49	0.182	1.18	24
tHb	g/dL	2	6.94	0.071	1.02	20
		3	19.32	0.243	1.26	20

# Whole blood precision study (capillary mode):

An additional precision study was conducted following guidance from CLSI EP5-A2. Whole blood was collected for use in an "in-house" precision study and utilized twenty (20) cobas b 123 POC analyzers, two sensor lots, samples tested in one run per day, in two replicates, and with samples at three clinically significant concentrations. The following tables present a summary of results:

## Repeatability (Within-Run): Summary of Results for pH

Sample	Mean (pH Units)	SD (pH Units)	CV (%)	n
Blood Sample 1	7.237	0.0029	0.04%	40
Blood Sample 2	7.441	0.0029	0.03%	40
Blood Sample 3	7.568	0.0054	0.07%	40

# Repeatability (Within-Run): Summary of Results for pO<sub>2</sub>

Sample	Mean (mmHg)	SD (mmHg)	CV (%)	n
Blood 1	145.4	0.7404	0.51	80
Blood 2	40.5	0.6888	1.70	80
Blood 3	352.2	2.0866	0.59	80

# Repeatability (Within-Run): Summary of Results for pCO<sub>2</sub>

Sample	Mean (mmHg)	SD (mmHg)	CV (%)	n
Blood 1	23.5	0.1174	0.50	80
Blood 2	72.7	0.3728	0.51	80
Blood 3	128.6	1.7942	1.39	80

# Repeatability (Within-Run): Summary of Results for Na<sup>+</sup>

Sample	Mean (mEq/L)	SD(mEq/ L)	CV (%)	n
Blood Sample 1	117.7	0.2845	0.24%	40
Blood Sample 2	138.6	0.2709	0.19%	40
Blood Sample 3	156.2	0.5890	0.37%	40

# Repeatability (Within-Run): Summary of Results for K<sup>+</sup>

Sample	Mean (mEq/L)	SD (mEq/L)	CV (%)	n
Blood Sample 1	3.05	0.0221	0.72%	40
Blood Sample 2	5.00	0.0148	0.29%	40
Blood Sample 3	6.10	0.0198	0.32%	40

# Repeatability (Within-Run): Summary of Results for Ca<sup>2+</sup>

Sample	Mean (mg/dL)	SD (mg/dL)	CV (%)	n
Blood Sample 1	2.90	0.03	1.065%	40
Blood Sample 2	4.74	0.04	0.79%	40
Blood Sample 3	5.60	0.07	1.25%	40

# Repeatability (Within-Run): Summary of Results for Hct

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	22.1	0.2461	1.11%	40
Blood Sample 2	38.5	0.1597	0.41%	40
Blood Sample 3	62.3	0.2370	0.38%	40

## Repeatability (Within-Run): Summary of Results for Glucose

Sample	Mean (mg/dL)	SD (mg/dL)	CV (%)	n
Blood Sample 1	47	1.1	2.28%	40
Blood Sample 2	90	1.1	1.27%	40
Blood Sample 3	488	2.8	0.56%	40

# Repeatability (Within-Run): Summary of Results for Lactate

Sample	Mean (mg/dL)	SD (mg/dL)	CV (%)	n
Blood Sample 1	8	0.10	1.18%	40
Blood Sample 2	13	0.09	0.69%	40
Blood Sample 3	32	0.51	1.56%	40

### Repeatability (Within-Run): Summary of Results for tHb

Sample	Mean (g/dL)	SD (g/dL)	CV (%)	n
Blood Sample 1	6.5	0.1058	1.62%	40
Blood Sample 2	12.9	0.0874	0.67%	40
Blood Sample 3	20.7	0.0703	0.33%	40

# Repeatability (Within-Run): Summary of Results for O<sub>2</sub>Hb

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	80.6	1.2296	1.52%	40
Blood Sample 2	94.5	0.5108	0.54%	40
Blood Sample 3	97.4	0.1342	0.13%	40

## Repeatability (Within-Run): Summary of Results for HHb

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	5.2	0.1828	3.51%	40
Blood Sample 2	9.5	0.2190	2.31%	40
Blood Sample 3	17.0	1.2248	7.20%	40

# Repeatability (Within-Run): Summary of Results for COHb

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	2.0	0.0946	4.73%	40
Blood Sample 2	5.4	0.0688	1.27%	40
Blood Sample 3	13.4	0.0894	0.66%	40

# Repeatability (Within-Run): Summary of Results for MetHb

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	1.3	0.0672	5.16%	40
Blood Sample 2	5.8	0.1125	1.93%	40
Blood Sample 3	30.7	0.3221	1.04%	40

# Repeatability (Within-Run): Summary of Results for SO<sub>2</sub>

Sample	Mean (%)	SD (%)	CV (%)	n
Blood Sample 1	82.6	1.2561	1.52%	40
Blood Sample 2	96.8	0.4976	0.51%	40
Blood Sample 3	99.7	0.1190	0.11%	40

A POC precision study was conducted at 6 external POC sites. The following table is a summary of precision studies conducted at the external POC sites using the cobas b 123 AutoQC Pack Tri-Level QC material:

	QC Level	Analyte Concentration (Mean)	Within-Run (SD) Within-Run (% CV)		Total Precision (SD)	Total Precision (% CV)
	Level 1	6.85 mg/dL	0.01 mg/dL	0.17	0.04 mg/dL	0.37
Ca	Level 2	4.93 mg/dL	0.01 mg/dL	0.24	0.02 mg/dL	0.37
	Level 3	2.69 mg/dL	0.02 mg/dL	0.57	0.04 mg/dL	0.81
	Level 1	2.99 mEq/L	0.01 mEq/L	0.19	0.01 mEq/L	0.45
K	Level 2	4.71 mEq/L	0.01 mEq/L	0.2	0.01 mEq/L	0.26
	Level 3	Level 3   6.97 mEq/L   0.01	0.01 mEq/L	0.16	0.02 mEq/L	0.34
	Level 1	117.5 mEq/L	0.14 mEq/L	0.12	0.33 mEq/L	0.28
Na	Level 2	140.4 mEq/L	0.24 mEq/L	0.17	0.34 mEq/L	0.24
	Level 3 153.1 mEq/L 0.22 m	0.22 mEq/L	0.14	0.33 mEq/L	0.22	
	Level 1	110 mg/dL	0.72 mg/dL	0.66	1.4 mg/dL	1.29
Glu	Level 2	45 mg/dL	0.72 mg/dL	1.74	0.90 mg/dL	1.98
	Level 3	443 mg/dL	2.3 mg/dL	0.55	6.3 mg/dL	1.49
Lac	Level 1	94.6 mg/dL	0.54 mg/dL	0.56	1.4 mg/dL	1.51

	Level 2	27.9 mg/dL	0.27 mg/dL	0.87	0.45 mg/dL	1.56
	Level 3	15.3 mg/dL	0.18 mg/dL	1.21	0.36 mg/dL	2.43
	Level 1	59.4%	0.10%	0.17	0.24%	0.4
Hct	Level 2	41.4 %	0.14%	0.33	0.19%	0.47
	Level 3	33.0 %	0.12%	0.37	0.16%	0.49
	Level 1	64.6 mmHg	0.45 mmHg	0.7	0.76 mmHg	1.17
PCO 2	Level 2	42.2 mmHg	0.17 mmHg	0.4	0.37 mmHg	0.88
	Level 3	25.9 mmHg	0.15 mmHg	0.57	0.42 mmHg	1.62
	Level 1	60.0 mmHg	0.92 mmHg	1.57	1.89 mmHg	3.22
PO2	Level 2	100.0 mmHg	1.00 mmHg	1.01	2.00 mmHg	2.02
	Level 3	148.0 mmHg	1.47 mmHg	1	2.44 mmHg	1.66
	Level 1	7.140	0.002	0.03	0.003	0.05
pН	Level 2	7.385	0.001	0.02	0.002	0.03
	Level 3	7.542	0.001	0.01	0.002	0.03
00	Level 1	22.5 %	0.12%	0.53	0.14%	0.64
CO Hb	Level 2	10.4 %	0.20%	1.96	0.22%	2.07
110	Level 3	3.5 %	0.25%	6.98	0.26%	7.32
	Level 1	17.6%	0.10%	0.55	0.12%	0.67
HHb	Level 2	8.1 %	0.16%	1.98	0.17%	2.08
	Level 3	2.9 %	0.19%	7.14	0.20%	7.45
	Level 1	11.8 %	0.06%	0.51	0.07%	0.61
Met Hb	Level 2	5.7 %	0.10%	1.69	0.10%	1.82
110	Level 3	1.9 %	0.12%	6.12	0.12%	6.3
0.077	Level 1	48.2 %	0.26%	0.55	0.32%	0.66
O2H b	Level 2	76.0 %	0.45%	0.6	0.48%	0.63
	Level 3	92.1 %	0.55%	0.6	0.57%	0.62
	Level 1	73.2 %	0.20%	0.28	0.25%	0.34
SO2	Level 2	90.3 %	0.23%	0.25	0.24%	0.27
	Level 3	96.9 %	0.21%	0.22	0.22%	0.23
	Level 1	7.1 g/dL	0.10 g/dL	1.35	0.12 g/dL	1.64
tHb	Level 2	11.6 g/dL	0.11 g/dL	0.98	0.15 g/dL	1.28
	Level 3	19.8 g/dL	0.17 g/dL	0.87	0.25 g/dL	1.25

### b. Linearity/assay reportable range:

A linearity study was designed based on CLSI EP6 guidance for each analyte. Samples were prepared by spiking 10 different levels of analyte into whole blood for each of the analyte tested. Each sample concentration was tonometered to the expected concentrations prior to running samples on the candidate device. Samples were tested in a single run in replicates of 5 on a single instrument. The observed values were plotted against expected values. Results of this study are summarized in the following table:

Analyte	Slope	Intercept	Correlation Coefficient (r <sup>2</sup> )	Linear Range Tested	Claimed Measuring Range
pO2	1.011	-2.993	0.9966	8.900 – 685.9 mmHg	10 – 685 mmHg
pCO2	0.976	1.812	0.9990	9.296 – 167.660 mmHg	10 – 150 mmHg
tHb	0.9895	0.0926	0.9972	3.132 – 27.013 g/dL	4 – 25 g/dL
O2Hb	0.9979	0.2813	0.9991	3.2 – 100 %	30 – 100 %
HHb	1.017	-0.1198	0.9989	0.19 – 96.6 %	0.5 – 70 %
COHb	0.9821	0.062	0.9999	1.0 – 78.9 %	1.1 – 70 %
MetHb	0.9996	-0.0898	1.00	0.6 – 79.2 %	0.95 – 70 %
SO2	1.0032	-0.3379	0.9990	30 – 100 %	30 – 100 %

An additional linearity study was performed using whole blood samples for the following analytes: pH,  $Na^+$ ,  $K^+$ ,  $Ca^{2+}$ , glucose, and lactate. The results are as follows:

Analyte	Slope	Intercept	(r <sup>2</sup> )	Linear Range Tested	Claimed Measuring Range
рН	1.007	-0.032	0.9996	6.499 – 8.319 pH units	6.5 – 8.0 pH units
Na <sup>+</sup>	1.006	-1.456	0.9993	88.16 – 212.3 mEq/L	100 – 200 mEq/L
K <sup>+</sup>	1.018	0.010	0.9989	0.752 – 16.61 mEq/L	1.0 – 15 mEq/L
iCa <sup>2+</sup>	0.985	-0.162	0.9769	0.756 - 12.842 mg/dL	1.09 – 10.02 mg/dL
Glucose	1.009	-6.236	0.9942	11.1 – 543.4 mg/ dL	18 – 540mg/dL

Lactate	1.027	-3.993	0.9969	4.1 – 214.3 mg/dL	9 – 180mg/dL
Hct	1.097	-4.095	0.9934	8.3 – 81.0 %	10 – 75 %

### c. Traceability, Stability, Expected values (controls, calibrators, or methods):

# Traceability:

All the analytes in the control/calibrator solutions are traceable to a reference method and the analyte targets are assigned based on the reference methods or other commercially available methods. See table below for traceability for calibrators and controls.

Analyte	Traceability		
рН	NIST SRM 2181 HEPES and		
	NIST SRM 2182 Na Salt		
$pO_2$	Fresh human blood tonometered with PRMs		
	(Primary Reference Materials):		
	• Linde O2 4.5 : purity =99.995% and		
	• N2 4.6 : purity = 99.996%		
	These standards are prepared gravimetrically by		
	National Standards Institutes		
	using guideline ISO6142 (2) as the primary		
	standard gas mixture. The gas		
	mixture is created by using a high precision gas		
	mixing system from LNI.		
$pCO_2$	Fresh human blood tonometered with PRMs		
	(Primary Reference Materials):		
	• Linde CO2 4.5: purity = 99.995%		
	This standard is prepared gravimetrically by		
	National Standards Institutes using		
	guideline ISO6142 (2) as the primary standard		
	gas mixture. The gas mixture is		
	created by using a high precision gas mixing		
	system from LNI.		
Na <sup>+</sup>	NIST SRM 2201: Sodium Chloride		
	Merck Sodium Bicarbonate /Sodium Carbonate		
	1962 (traceable to		
	NIST SRM 191b: Sodium Bicarbonate and NIST		

	SRM 192a: Sodium
	Carbonate)
	Merck Sodium Acetate Trihydrate (Extra Pure)
K <sup>+</sup>	6268: purity = 99.5-100%  NIST SRM 2202: Potassium Chloride
$Ca^{2+}$	
Ca	Merck CertiPUR 119778 Calcium standard
	solution (traceable to NIST
	SRM 3109a: Spectrometric Standard Solution
***	Calcium)
Hct	There is no standard reference material available.
	Fresh human blood samples were analyzed using
	the Hemafuge®
	(microcentrifuge) according to CLSI H7-A3:
	Procedure for Determining Packed
	Cell Volume by the Microhematocrit Method;
	Approved Standard—Third
	Edition (Vol. 20, No. 18).
Glucose	NIST SRM 917b: D-Glucose (Dextrose)
Lactate	There is no reference material available.
	The material used was Fluka 71718 Sodium
	Lactate: purity $\geq$ 99.0%.
tHb	There is no reference material available.
	Oxygenated whole blood samples were analyzed
	with a Hellma spectrometer using the
	HiCN reference method in accordance with CLSI
	H15-A3: Reference and Selected
	Procedures for the Quantitative Determination of
	Hemoglobin in Blood; Approved
	Standard—Third Edition (Vol. 20, No. 28).
	The Hellma spectrometer was calibrated with
	NIST SRM 930e: Glass Filters for
	Spectrophotometry.
O <sub>2</sub> Hb	There is no reference material available.
_	A pool of human blood was tonometered at
	sample values of 0% and 100% with PRM
	(Primary Reference Material):
	- Linde O2 4.5 : purity =99.995%
	This standard is prepared gravimetrically by
	National Standards Institutes using
	guideline ISO6142 (2) as the primary standard
	gas mixture. The gas mixture is created
	by using a high precision gas mixing system
	from LNI.
HHb	There is no reference material available.
	A pool of human blood was tonometered at
	sample values of 0% and 100% with PRM
	bumple values of 0/0 and 100/0 with I Kivi

	T
	(Primary Reference Material):
	-Linde CO2 4.5: purity = 99.995%
	This standard is prepared gravimetrically by
	National Standards Institutes using
	guideline ISO6142 (2) as the primary standard
	gas mixture. The gas mixture is created
	by using a high precision gas mixing system
	from LNI.
COHb	There is no reference material available.
	A pool of human blood was tonometered at
	sample values of 0% and 100% with
	PRM (Primary Reference Material):
	• Linde CO 3.7 : purity =99.97%
	This standard is prepared gravimetrically by
	National Standards Institutes using
	guideline ISO6142 (2) as the primary standard
	gas mixture. The gas mixture is created
	by using a high precision gas mixing system
	from LNI.
MetHb	There is no reference material available.
	A pool of human blood was tonometered with at
	sample values of 0% and 100% with
	PRM (Primary Reference Material):
	- Linde N2 4.6 : purity = 99.996%
	– Linde NO 2.5 : purity =99.5%
	These standards are prepared gravimetrically by
	National Standards Institutes using
	guideline ISO6142 (2) as the primary standard
	gas mixture. The gas mixture is created
	by using a high precision gas mixing system
	from LNI.
$SO_2$	There is no reference material available.
	Whole blood samples were tonometered at
	sample values of 30% and 100% with PRMs
	(Primary Reference Materials):
	• Linde O2 4.5 : purity =99.995% %
	This standard is prepared gravimetrically by
	National Standards Institutes using
	guideline ISO6142 (2) as the primary standard
	gas mixture. The gas mixture is created
	by using a high precision gas mixing system
	from LNI.
	The primary standard is used to calibrate the
	reference instrument, the AVL OMNI 12.

#### Stability:

#### Shelf life Stability Study:

For this study, three lots of sensor cartridges (BG/ISE/Glu/Lac) were evaluated using five sensors from each lot. Each sensor lot was stored at 2-8 °C and after 4 months the following materials were tested in singlet: Quality Control (QC) material, Calibration Verification Control material, plasma, and whole blood. The results of the study supports the shelf life stability claim of up to 4 months based on real-time testing on three lots for the sensor cartridges.

#### Shelf life Stability Study (Fluid pack):

For this study, the fluid pack was stored at  $15 - 25^{\circ}$ C and tested at the following time intervals: T = 0, 6, 9, and 13 months. Each result obtained at each time point was compared back to baseline (t=0). The results of the study support a shelf life of 9 months when stored unopened at  $15 - 25^{\circ}$ C.

#### On-board stability study:

Six sensor (BG/ISE/Glu/Lac) cartridge lots were stored on-board the system at 37 °C. Three quality control levels were tested at regular time intervals over a total of 28 days.

The results of the study support an on-board stability of the following:

Stability of up to 28 days at 37°C for BG (blood gas sensor cartridges)

Stability of up to 28 days at 30°C for glucose (sensor cartridges) and ISE (ion selective electrode sensor cartridges)

Stability of up to 21 days at 30°C for lactate sensor cartridges.

#### On-board stability study (fluid pack):

A study was conducted evaluating the cobas b 123 fluid pack which contains five components: calibration solution 1, calibration solution 2, standby solution, reference solution, and sol-wet solution. The fluid pack's stability was carried out at 32°C for 42 days. This study supports the on-board stability claim of 42 days.

Value Assignment for Roche AUTOTROL 123:

For lot- specific value assignment, each autoQC pack (containing 8 ampoules per level, 5 of the new lot and 3 of the reference lot) were tested in two runs

on at least three (3) cobas b 123 POC systems. The following table represents the target values for the Roche AUTOTROL 123 levels:

		Target Value		
		Level 1	Level 2	Level 3
Analyte	Units	Mean	Mean	Mean
pН	pH units	7.100 - 7.180	7.345 - 7.425	7.502 - 7.582
pO2	mmHg	48 - 72	88 - 112	136 – 160
pCO2	mmHg	60.6 - 68.6	38.7 - 45.7	22.4 - 29.4
Na	mEq/L	113.0 - 122.0	135.4 – 145.4	147.6 – 158.6
K	mEq/L	2.79 - 3.19	4.41 - 5.01	6.62 - 7.32
Ca	mg/dL	6.252 - 7.455	4.529 - 5.331	2.285 - 3.086
Hct	%	54.4 – 64.4	36.4 - 46.4	28.0 - 38.0
Glucose	mg/dL	94 - 126	36 – 54	389 – 497
Lactate	mg/dL	77 - 113	23 - 32	12 – 19
tHb	g/dL	6.4 - 7.8	10.6 - 12.6	18.4 - 21.2
O2Hb	%	44.2 - 52.2	72.0 - 80.0	88 .1 – 96.1
HHb	%	14.6 - 20.6	5.1 – 11.1	0.0 - 5.7
СОНЬ	%	20.0 - 25.0	7.9 - 12.9	1.0 - 6.0
MetHb	%	10.3 - 13.3	4.2 - 7.2	0.4 - 3.4
SO2	%	71.7 – 75.2	87.8 – 93.4	94.4 – 100.0

## Value Assignment for Combitrol Plus B:

For lot- specific value assignment, each COMBITROL PLUS B (levels 1, 2, 3) were tested in duplicate using 8 ampoules per level (5 of the new lot, 3 of the reference lot) with two (2) runs per system. At least three (3) cobas b 123 POC systems were used for the study. The following table represents the target values for the Roche AUTOTROL 123 levels:

		Target Value		
		Level 1	Level 2	Level 3
Analyte	Units	Target range	Target range	Target range
pН	pH units	7.159 - 7.239	7.393 - 7.473	7.515 – 7.595
pO2	mmHg	40 - 64	82 – 106	131 – 155
pCO2	mmHg	61.1 – 69.1	39.1 – 46.1	19.4 - 26.4
Na	mEq/L	120.1 – 129.1	137.8 – 147.8	156.0 - 167.0
K	mEq/L	2.82 - 3.22	4.44 - 5.04	6.77 - 7.47
Ca	mg/dL	6.373 - 7.575	4.569 - 5.371	1.884 - 2.685
Hct	%	47.8 - 57.8	34.8 – 44.8	24.1 - 34.1
Glucose	mg/dL	86 – 119	38 56	339 – 447
Lactate	mg/dL	70 – 106	23 - 32	11 - 18
tHb	g/dL	6.7 - 8.1	11.1 – 13.1	18.6 - 21.4
O2Hb	%	43.2 – 51.2	71.0 - 79.0	87.6 – 95.6
HHb	%	15.0 - 21.0	5.5 – 11.5	0.0 - 5.8

COHb	%	20.4 – 25.4	8.3 - 13.3	1.2 - 6.2
MetHb	%	10.5 – 13.5	4.4 - 7.4	0.5 - 3.5
SO2	%	67.3 - 77.3	86.1 – 93.5	93.8 - 100.0

Value Assignment for Calibration Verification Control (CVC):

The six levels of cobas b 123 CVC material are assigned based on the measuring range established by the cobas b 123 POC system. The following table represents the target values of each analyte (parameter):

		Target Value			
		Level 1	Level 2	Level 3	
		Mean	Mean	Mean	
pН	pH Units	7.12 - 7.18	7.38 - 7.42	7.52 - 7.58	
PO <sub>2</sub>	mmHg	55 – 75	92 – 107	135 – 160	
PCO <sub>2</sub>	mmHg	60 - 70	38 – 46	21 - 27	
Na	mEq/L	110-122	133 – 143	150 – 160	
K	mEq/L	2.50 - 3.50	4.30 - 5.30	6.30 - 7.50	
iCa	mg/dL	6.012 - 6.81	4.329 - 5.13	2.00 - 3.20	
Hct	%	54 – 62	36 – 44	26 – 34	
Glu	mg/dL	99 – 117	41 – 49	351 – 451	
Lac	mg/dL	81 - 99	25 - 29	13 – 15	
tHb	g/dL	6.7 - 8.7	11.5 – 13.5	19.5 - 22.5	
O2Hb	%	40 – 54	68 - 82	88 – 98	
HHb	%	14 - 22	5 – 12	0-6	
СОНЬ	%	19 - 27	7 – 15	0 - 6	
MetHb	%	8 - 16	2 - 10	0 - 6	
SO <sub>2</sub>	%	65 – 79	85 – 94	94 – 100	

#### d. Detection limit:

Refer to the linearity study data above in M.2.b. for the detection limits claim for all analytes. In addition, the sponsor conducted a Limit of Blank (LoB), Limit of Detection (LoD), and Limit of Quantitation (LoQ) study following the CLSI EP – 17A guideline for the following analytes: Glucose, ICa, and Lactate. To determine LoB, zero level samples were prepared and measured on ten cobas b 123 POC instruments to obtain blank measurements (N=60). To determine the LoD and LoQ, whole blood samples with low levels of analyte (approximately 4 x LoB) were measured on ten instruments (N=200). The LoQ was determined based on the inter-assay precision (%CV). Results of the study are presented in the following table:

Analyte	LoB	LoD	LoQ	%CV for	Claimed
				LoQ	Measuring
					Range
Glucose	3.1 mg/dL	5.4 mg/dL	13.1 mg/dL	12.1%	18 - 540
iCa	0.000	0.1907	1.057 mg/dL	11.8%	1.09 - 10.02
	mg/dL	mg/dL			
Lactate	0.00 mg/dL	0.84 mg/dL	5.6 mg/dL	8.5%	9 – 180

# e. Analytical specificity:

The interference study was performed according to the CLSI guideline EP7-A2. The study used spiked and diluted human whole blood samples containing potential interferents for pH, pO2, pCO2, sodium, potassium, calcium, Hct, tHb, O2Hb, HHb, COHb, MetHb, SO2, lactic acid, and glucose. Each sample containing interferent was evaluated against a reference whole blood sample without interferent. The following table represents substances that were tested without significant effects on test results:

Interference substance test	Highest	Analyte
	concentration tested	
3- beta - Hydroxybutyrate	20 mmol/L	pH, ISE, Glu, Lac
Acetoacetate	2 mmol/L	pH, ISE, Glu, Lac
Acetone	12.00 mmol/L	BG, pH, ISE, Glu, Lac
Acetylcysteine	10.2 mmol/L	Na, K,, Hct
Albumin	> 9.0%	BG, pH, ISE, Glu,
Albumm		Lac, Hct
Ammonium Chloride	0.107 mmol/L	BG, pH, ISE Glu,
Allinomum Chloride		Lac
Ampicillin	0.15 mmol/L	BG, pH, ISE, Glu,
Amplemin		Lac
Ascorbic Acid	0.34 mmol/L	ISE, Glu, Lac
Aspirin (Acetylsalicylic acid)	3.62 mmol/L	Na, K,, Glu, Lac
Benzalkonium chloride	0.028 mmol/L	pH, K, Ca, , Glu,
Benzarkomum emoride		Lac
Beta-Carotene	2.0 mg/L	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Bilirubin	0.342 mmol/L	BG, pH, ISE, Glu,
Dilluoili		Lac
Calcium chloride	5.0 mmol/L	ISE, Glu, Lac
Cefoxitin	1.546 mmol/L	ISE, Glu, Lac

Chlorpromazine	0.0063 mmol/L	BG, pH, ISE, Glu,
<u> </u>	0.0042	Lac
Cyclosporine	0.0043 mmol/L	BG, pH, ISE, Glu, Lac
Creatinine	0.442 mmol/L	BG, pH, ISE, Glu,
		Lac
Cyanide	0.1 mmol/L	BG, pH, ISE, Glu,
		Lac
Dobesilate	0.880 mmol/L	BG, ISE, Glu, Lac
Dopamine	0.00587 mmol/L	BG, pH, ISE, Glu,
		Lac
Dobutamine	0.66 mmol/L	pH, K, Ca, , Glu,
		Lac
Doxycyline	0.068 mmol/L	BG, pH, ISE, Glu,
		Lac
EDTA	0.0003 mmol/L	ISE, Glu, Lac
Ethanol	86.80 mmol/L	BG, pH
Ethylene glycol	2.425 mmol/L	BG, pH, ISE, Glu,
		Lac
Evans blue	5 mg/L	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Gelfusine	Dilution 1:1	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Gentamicin	0.021 mmol/L	BG, pH, ISE, Glu,
		Lac
C A . I	0.117 mmol/L	BG, pH, ISE, Glu,
Gentisic Acid		Lac
Glutathione, reduced	3.0 mmol/L	ISE, Glu, Lac
Glycolic Acid	13.05 mmol/L	PO2, Na, K, , Glu
G :	0.4 mmol/L	BG, pH, ISE, Glu,
Guaiaco		Lac
	Dilution 1:1	tHB, HHb, O2Hb,
HAES-sterile 10%		COHb, MetHb,
		SO2
HAES (Hydroxyethylstarch)	50.0%	BG, ISE, Glu, Lac
Halothane	0.759 mmol/L	PO2
Hamaalahir	2.00 g/L	BG, pH, ISE, Glu,
Hemoglobin		Lac
Hydroxycarbamide	2.50 mmol/L	BG, pH,ISE
(Hydroxyurea)		- '
Hydroxocobalmin	0.25 mg/mL	tHb, HHb, O2Hb,
•		COHb, MetHb,
		SO2
Ibuprofen	2.425 mmol/L	ISE, Glu, Lac

Indocyanine green	5 mg/mL	tHb, HHb, O2Hb,
		COHb, MetHb, SO2
Isoflurane	3.00 %	BG, pH, ISE, Glu,
		Lac
Isoniazid	0.29 mmol/L	BG, pH, ISE, Glu,
		Lac
Intralipid 20%	10 mg/mL	tHB, HHb, O2Hb,
		COHb, MetHb,
<u> </u>	17	SO2
Lactate	6.6 mmol/L	ISE, Glu
Levodopa (L-Dopa)	0.12 mmol/L	BG, pH, ISE, Glu, Lac
Lipfundin 20% with MCT	10 mg/ mL	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Lipidem	10 mg/mL	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Lithium acetate	3.20 mmol/L	BG, pH, ISE, Glu,
		Lac
Maltose	13.62 mmol/L	BG, pH, ISE, Glu, Lac
Methyldopa	0.071 mmol/L	BG, pH, ISE, Glu, Lac
Methylene blue	2.5 mg/L	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Metronidazole	0.701 mmol/L	pH, ISE, Glu, Lac
Monosodium phosphate	9.0 mmol/L	ISE, Glu, Lac
Norepinephrine	0.12 mmol/L	BG, pH, ISE, Lac
Nitrous Oxide	85%	PO2
Omegaven	5 mg/mL	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2, tHB, HHb,
		O2Hb, COHb,
		MetHb, SO2,
Paracetamol(Acetaminophen)	1.320 mmol/L	BG, pH, ISE, Glu, Lac
Patent blue	2.5 mg/L	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Perphenazine	0.0.223 μmol/L	BG, pH, ISE, Glu,
	· ·	Lac
pH low	7.1	tHB, HHb, O2Hb,
		COHb, MetHb,

		SO2
pH high	7.9	tHB, HHb, O2Hb,
r8	1,35	COHb, MetHb,
		SO2
Phenobarbital	0.431 mmol/L	BG, pH, ISE, Glu,
		Lac
Phenylbutazone	1.3 mmol/L	ISE, Glu, Lac
Phenytoin	0.198 mmol/L	BG, pH, ISE, Glu,
,		Lac
Potassium Thiocyanate	6.88 mmol/L	BG, pH, Na, Ca,
•		Lac
Propofol	1.00 %	BG
Propofol 2%	0.11 mg/mL	tHB, HHb, O2Hb,
-		COHb, MetHb,
		SO2
pCO2	0.00 mm Hg	pO2, ISE, Glu, Lac
pCO2	85.0 mmHg	ISE, Glu, Lac
pO2	600.0 mmHg	BG, pH, ISE, Glu,
		Lac
pO2	<25 mmHg	BG, pH, ISE, Glu,
		Lac
Rifampicin	0.078 mmol/L	BG, pH, ISE, Glu,
		Lac
SMOF Lipid 20%	10 mg/mL	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Sodium Bicarbonate	35 mmol/L	ISE, Glu, Lac
Sodium Bromide	37.5 mmol/L	pH, K, Ca, Lac
Sodium Chloride	45 mmol/L	BG, pH, ISE, Glu,
		Lac
Sodium Fluoride	0.105 mmol/L	BG, pH, ISE, Glu,
		Lac
Sodium glutamate	0.86 mmol/L	ISE, Glu, Lac
Sodium heparin	3000 IU/L	BG, ISE, Glu, Lac
Sodium Pyruvate	0.309 mmol/L	BG, pH, ISE, Glu,
		Lac
Albumin	12 g/dL	tHB, HHb, O2Hb,
		COHb, MetHb,
m: 1 : 1	27.00	SO2
Triglyceride	37.00 mmol/L	BG, pH, ISE, Glu,
**	40.20	Lac
Urea	49.20 mmol/L	BG, pH, ISE, Glu,
TT . A . 1	1.40	Lac
Uric Acid	1.40 mmol/L	ISE, Glu
Vancomycin	0.069 mmol/L	BG, pH, ISE, Glu,

		Lac
Voluven 6%	Dilution 1:1	tHB, HHb, O2Hb,
		COHb, MetHb,
		SO2
Xylose	4.00 mmol/L	BG, pH, ISE, Glu,
		Lac

Additional interference study testing the following analytes at two levels (low and high) against additional potential interferents was performed. The following is a summary of what was tested:

Na+, K+, and Ca2+: potential interference with benzalkonium, thiocyanate, salicylate, bromide, iodide

Glucose and Lactate: potential interference with uric acid, ascorbic acid, acetaminophen, dopamine, sodium fluoride, and oxalate

pO2: potential interference with nitrous oxide, halothane, and isoflurane

The results of this adjunctive study showed that there was interference with benzalkonium chloride at low and high sodium concentrations.

The following table represents substances which interfered:

Interference substance tested	Highest concentration of interfering substance (mmol/L)	Analyte (Na)/ concentration (mEq/L)	Effect of the interferent (mEq/L)	± Trueness (mean bias) mEq/L
Benzalkonium	0.0280	116.47	$2.81 \pm 0.42$	2.9
chloride	152.20	152.20	$4.07 \pm 0.83$	3.6
Dobutamine	0.66	137.4	$21.2 \pm 2.3$	3.1
Interference substance tested	Highest concentration of interfering substance (mmol/L)	Analyte (Hct)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)
Sodium Chloride	45.0	43.3	$-9.4 \pm 0.2$	3.000
Interference substance tested	Highest concentration interfering substance (mmol/L)	Analyte (Glucose)/ concentration (mg/dL))	Effect of the interferent (mg/dL)	± Trueness (mean bias) (mg/dL)
Acetylcysteine	4 10.2	73.88	$\frac{1}{25.2 \pm 9.01}$	9.163

Hydroxycarbam ide	2.50	72.08	$21.6 \pm 12.6$	9.010
(Hydroxyurea) Norepinephrine	0.118	73.88	$-9.01 \pm 3.6$	9.848
Potassium Thiocyanate	6.88	72.08	$21.6 \pm 7.2$	9.010
Sodium Bromide	37.50	72.08	$9.01 \pm 5.4$	9.010
Interference substance tested	Highest concentration of interfering substance (mmol/L)	Analyte (Lactate)/ concentration (mg/dL))	Effect of the interferent (mg/dL)	± Trueness (mean bias) (mg/dL)
Acetylcysteine	10.20	49.54	$-12.6 \pm 2.7$	6.513
Glycolic acid	13.05	46.84	6.3±4.5	6.313
Hydroxycarbam ide (hydroxyurea)	2.50	43.24	-10.8±5.4	6.046
Uric Acid	1.4	54.05	-8.1±0.9	6.760
Interference substance tested	Highest concentration of interfering substance	Analyte (tHb)/ concentration (g/dL)	Effect of the interferent (g/dL)	± Trueness (mean bias) (g/dL)
Methylene blue	40 mg/L	13.7	-1.1	0.5
Hydroxycobala min	0.90 mg/mL	13.6	-0.5	0.5
Sulfhemoglobin	10%	17.41	"spectral interference detected"	0.5
Cyanomethemo globin	10%	14.21	"spectral interference detected"	0.5
Fluorescein	0.4 mg/mL	14.53	"spectral interference detected"	0.5
Interference substance tested	Highest concentration of interfering substance	Analyte (O2Hb)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)
Sulfhemoglobin	10%	94.22	"spectral interference detected"	3.00
Cyanomethemo globin	10%	95.81	"spectral interference detected"	3.00

Fluorescein	0.4 mg/mL	96.91	"spectral interference detected"	3.00
Interference substance tested	Highest concentration of interfering substance	Analyte (HHb)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)
Sulfhemoglobin	10%	3.53	"spectral interference detected"	2.00
Cyanomethemo globin	10%	2.06	"spectral interference detected"	2.00
Fluorescein	0.4 mg/mL	1.34	"spectral interference detected"	2.00
Interference substance tested	Highest concentration of interfering substance	Analyte (COHb)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)
Sulfhemoglobin	10%	1.68	"spectral interference detected"	1.17
Cyanomethemo globin	10%	1.45	"spectral interference detected"	1.15
Fluorescein	0.4 mg/mL	1.31	"spectral interference detected"	1.13
Interference substance tested	Highest concentration of interfering substance	Analyte (MetHb)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)
Sulfhemoglobin	10%	0.58	"spectral interference detected"	1.12
Cyanomethemo globin	10%	0.68	"spectral interference detected"	1.14
Fluorescein	0.4 mg/mL	0.44	"spectral interference detected"	1.09
Interference substance tested	Highest concentration of interfering	Analyte (SO2)/ concentration (%)	Effect of the interferent (%)	± Trueness (mean bias) (%)

	substance			
Sulfhemoglobin	10%	96.39	"spectral	2.00
			interference	
			detected"	
Cyanomethemo	10%	97.89	"spectral	2.00
globin			interference	
			detected"	
Fluorescein	0.4 mg/mL	98.64	"spectral	2.00
			interference	
			detected"	

f. Assay cut-off: Not applicable.

### 2. Comparison studies:

### a. Method comparison with predicate device:

A multi-center clinic evaluation consisting of a total of six clinics (2 laboratory and 4 point-of-care sites) was conducted for the following analytes: pO2, pCO2, pH, Na, K, Ca, Hct, Glucose, Lactate, tHb, O2Hb, HHb, COHb, MetHb, and SO2. Method comparison studies were performed using Roche cobas b 123 and other commercially available devices. In order to cover the hard-to-find sample range, an internal method comparison study was performed using some altered samples that span the entire claimed measuring ranges for all the analytes. Singlet set of data was used for the linear regression analysis. Results are summarized in the table below:

Analyte	Unit of Measure	n	Range	Slope	Intercept	r
рН	pH Units	764	6.59 - 7.89	0.9930	0.0607	0.9940
$pO_2$	mmHg	737	13.3 - 638.0	0.9685	-0.2771	0.9977
$pCO_2$	mmHg	731	16.6 – 149.5	0.9698	1.100	0.9921
Na <sup>+</sup>	mEq/L	822	102.0 – 199.2	1.0367	-4.855	0.9793
$K^{+}$	mEq/L	814	1.43 - 13.54	0.9638	0.1242	0.9982
iCa <sup>2+</sup>	mg/dL	817	1.180 - 9.535	0.9878	0.0199	0.9808
Hct	%	747	12.5 - 68.7	0.9521	1.506	0.9881
Glucose	mg/dL	719	18.9 - 539.0	1.000	-3.11	0.9880
Lactate	mg/dL	622	9.0 - 171.8	1.0227	0.2406	0.9945
tHb	g/dL	750	4.24 - 22.6	0.9643	-0.0035	0.9888
O <sub>2</sub> Hb	%	734	31.5 – 98.3	0.9908	1.3011	0.9976
HHb	%	608	0.5 - 69.5	1.0200	-0.7370	0.9948
COHb	%	695	1.1 – 63.1	1.0000	0.0000	0.9997
MetHb	%	87	1.0 - 59.3	0.9896	0.1093	0.9999
$SO_2$	%	734	32.0 – 100.0	1.0106	-0.4291	0.9931

# b. Matrix comparison:

Not applicable. Only heparinized whole blood samples are used with this device.

## 3. Clinical studies:

a. Clinical Sensitivity:

Not applicable.

b. Clinical specificity:

Not applicable.

c. Other clinical supportive data (when a. and b. are not applicable):

Not Applicable.

# 4. Clinical cut-off:

Not Applicable.

5. Expected values/Reference range:

Analyte	Population	Reference range	Cited from
Sodium	Adult	136- 145	Tietz 2006 <sup>1</sup>
		mmol/L	
		136- 145 mEq/L	
	Adult> 90 years	132- 146	Tietz 2006 <sup>2</sup>
		mmol/L	
		132- 146 mEq/L	
Potassium	Adult	3.5 - 5.1 mmol/L 3.5- 5.1	Tietz 2006 <sup>3</sup>
(serum)		mEq/L	
Ionized	Adult, female & male	1.15 – 1.33 mmol/L	Tietz 2006 <sup>4</sup>
Calcium		4.6 - 5.3  mg/dL	
Methemoglobin		0.06- 0.24 g/dL	Tietz 2006 <sup>5</sup>
		9.3 - 37.2 μmol/L	
		0.04 - 1.52 % of total Hb	
		0.0004- 0.0152	
		mass fraction of total Hb	
Glucose (whole	Adult	65- 95 mg/dL	Tietz 2006 <sup>6</sup>

blood, heparin)		3.5 - 5.3 mmol/L	
Lactate (whole blood)		venous (at bed rest) 5- 15 mg/dL 3-7 mg/dL	Tietz 2006 <sup>7</sup>
		arterial (at bed rest) 0.56 - 1.39 mmol/L 0.36 - 0.75 mmol/L	
Analyte	Population	Reference range	Cited from
рН	Arterial whole blood: Adult, children	7.35 - 7.45	Tietz 2006 <sup>8</sup>
PO2	Arterial whole blood: Adult, children (2 days-60 years)	83 - 108 mmHg	Tietz 2006 <sup>8</sup>
PCO2	Adult (male) arterial whole blood	35 - 48 mmHg	Tietz 2006 <sup>9</sup>
	Adult (female) arterial whole blood	32 - 45 mmHg	Tietz 2006 <sup>9</sup>
Hct	Adult Male Adult Female	39 – 50 % 35 – 47 %	Tietz 1987 <sup>10</sup>
tHb (arterial whole blood)	Adult Male Adult Female	13.1 – 17.2 g/dL 11.7 – 16.0 g/dL	Tietz 1987 <sup>10</sup>
SO2	Newborn	40 – 90%	Tietz 2006 <sup>8</sup>
	Thereafter (Arterial whole blood)	94 – 98%	Tietz 2006 <sup>8</sup>
О2НЬ	Whole Blood (Nonsmoker)	94 – 98%	American Environmental Laboratory <sup>11</sup>
ННЬ	Whole Blood	1 – 5%	American Environmental Laboratory <sup>11</sup>
СОНЬ	Whole Blood (Nonsmoker)	0.5 - 1.5%	Tietz 2006 <sup>9</sup>

## **Citations**

- Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p. 2294
- 2. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2295
- 3. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2291
- 4. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2258

- 5. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2317
- 6. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2271
- 7. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2282
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- 9. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 4th Edition 2006, p.2259
- 10. Tietz Textbook of Clinical Chemistry and Molecular Diagnostics: 3rd Edition 1987, p.1817
- 11. American Environmental Laboratory: The Laboratory Assessment of Oxygenation: Robert F. Morgan 1993, 5(4), p. 147 153

#### N. Instrument Name:

Cobas® b 123 POC System

### O. System Descriptions:

1.	Modes of Operation:
	Single sample
	Does the applicant's device transmit data to a computer, webserver, or mobile device using wireless transmission?
	Yes or NoX
2.	Software:
	FDA has reviewed applicant's Hazard Analysis and software development processes for this line of product types:
	YesX or No
3.	Specimen Identification:
	Single sample barcode reader
4.	Specimen Sampling and Handling:

This device is intended to be used with whole blood samples.

### 5. Calibration:

Two point calibration of all parameters.

### 6. Quality Control:

QC consists of the following materials: AutoQC module with AutoQC pack for automated QC measurements

Combitrol Plus B – control material for manual QC measurements

# P. Other Supportive Instrument Performance Characteristics Data Not Covered In The "Performance Characteristics" Section above:

None

### Q. Proposed Labeling:

The labeling is sufficient and it satisfies the requirements of 21 CFR Part 809.10.

#### **R.** Conclusion:

The submitted information in this premarket notification is complete and supports a substantial equivalence decision.